

Remarks

Applicant requests favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Applicant requests acknowledgment of receipt of the certified copies of the priority documents, which were filed on April 17, 2001.

Claims 1-22 are pending in this application. Claims 1 and 19-22 are the independent claims under consideration.

Claim 2 has been cancelled without prejudice. Claims 1, 3-5, 7, and 19-22 have been amended. No new matter has been added.

Claims 4, 5, and 7 stand rejected under 35.U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant has amended those claims to address the Examiner's objection. In particular, the phrase "represents image" has been amended to --represents an image--. Applicant notes that "represents said particular image" as suggested by the Examiner is not what is intended. The limitation of Claim 4 relates to whether, at the object image judgment step, the image data represents an image (as opposed to, for example, text or graphics). This step comes before the particular image judgment step. Reconsideration and withdrawal of the rejection are requested.

Claims 1, 2, 3, 4, 7, 8, 9, 10, 16, 17, 19, 20, 21, and 22 stand rejected under 35.U.S.C. §102(b) as being clearly anticipated by U.S. Patent No. 5,533,144 (Fan). The remaining dependent claims stand variously rejected under 35.U.S.C. §103(a) as being unpatentable over Fan in combination with one of U.S. Patent No. 6,317,524 (Wu et al.), U.S. Patent No. 6,765,688 (Claiborne), U.S. Patent No. 6,285,776 (Rhoads), or U.S. Patent

No. 5,533,144 (Suzuki et al.). Applicant respectfully traverses these rejections for the reasons discussed below.

As recited in independent Claim 1, the present invention includes, *inter alia*, the features of judging whether or not image data indicated by inputted print information has a resolution equal to or higher than a predetermined resolution and, if so, judging whether or not the image data represents a particular image. In this manner, the processing burden of judging whether image data represents a particular image (e.g., a banknote or currency) can be reduced. That is, if the image data is below a resolution that could be used for a counterfeit document, it is not necessary to judge whether the image data corresponds to a particular image. Applicant submits that the cited art fails to disclose or suggest at least the above-mentioned features.

Fan discloses judging whether the edge strength for each block is more than a threshold. Blocks having an edge strength below the threshold are ignored. For blocks having an edge strength above the threshold, the edge orientations are evaluated and image matching between the blocks and a template image is performed after rotating the orientation of the template image in the direction of the edge orientation of the blocks. Fan does not disclose or suggest judging whether image data represents a particular image if the image data has a resolution equal to or higher than a predetermined resolution.

The Examiner asserts that the determination of edge strength is essentially a determination of resolution because a low resolution image would not have sharp edges. Applicant respectfully disagrees and submits that judging whether image data has a resolution equal to or greater than a predetermined threshold is not the same as determining edge strength and then making an assumption, as the Examiner suggests, that low edge

strength means low resolution. Moreover, Applicant respectfully submits that such an assumption, that low edge strength corresponds to low resolution, is incorrect. Fan states that “quiet blocks” containing “little pixel variation” can be initially discarded as an edge is not present within the block. Col. 2, lines 64-66. The fact that there is little pixel variation does not correspond to a low resolution image; there could be numerous pixels (i.e., a high resolution image) and still have little variation. For example, one could have a high resolution image of a face, but a block containing a portion of a cheek could have little variation compared to a block having an edge of an eye.

The other cited art does not remedy Fan’s deficiencies.

Accordingly, Applicant submits that the cited art fails to disclose or suggest at least the above-mentioned features, and therefore Claim 1 is patentable. The other independent claims contain similar features and are believed patentable for similar reasons.

The dependent claims are believed patentable for at least the same reasons as the independent claims, as well as for the additional features recited in the dependent claims.

In view of the foregoing, Applicant submits that this application is in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejections, and an early Notice of Allowance are requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



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